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~~FOR SOLE USE OF THE~~

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Attorneys for Defendants
COUNTY OF SAN MATEO, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTIAN R. WILLIAMS

Case No. CV-03-5158 RMW

Plaintiff,

**STIPULATION AND ~~PROPOSED~~ ORDER
RE CASE MANAGEMENT CONFERENCE**

vs.

COUNTY OF SAN MATEO, et al.

Defendants.

RECITALS

1. WHEREAS, this case was initially filed in 2003;
2. WHEREAS, the County filed a motion for summary judgment in March 2008, which was granted in September 2008;
3. WHEREAS, the Ninth Circuit reversed in July 2012 and Ordered that Plaintiff be appointed counsel;
4. WHEREAS, in September 2012 the District Court reopened the case, but stayed it pending appointment of counsel (and an additional four weeks following appointment);

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STIPULATION AND ~~PROPOSED~~ ORDER RE CASE MANAGEMENT CONFERENCE

5. WHEREAS, in January 2013 the District Court appointed counsel;

6. WHEREAS, since that time the undersigned have been diligently exploring whether the case can be resolved without further litigation;

7. WHEREAS, after ongoing conversations, the parties have reached an agreement regarding the financial terms of a proposed settlement agreement resolving this matter without further litigation;

8. WHEREAS, the parties continue to discuss the resolution of non-financial terms of a proposed settlement agreement and are optimistic that such non-financial terms may be resolved without further litigation;

9. WHEREAS, those conversations remain ongoing, no significant discovery has occurred, but a Case Management Conference is scheduled for October 18, 2013, a date which triggers meet and confer and filing requirements that the parties would prefer to delay until they exhaust current resolution efforts;

10. WHEREAS, October 18, 2013 is the third scheduled Case Management Conference and the parties have previously requested two continuances of the Case Management Conference in order to explore whether the case can be resolved without further litigation;

11. WHEREAS, because Plaintiff remains in civil custody, communication with him is more challenging than normal and can therefore require additional time;

12. WHEREAS, Plaintiff has been experiencing health problems causing further challenges in communications with him;

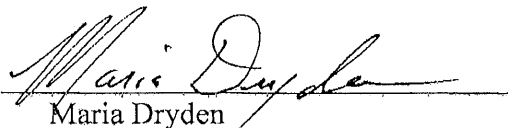
STIPULATION

The parties hereby stipulate that, with the Court's agreement, the Case Management Conference currently scheduled for October 18, 2013, be continued for approximately three months to facilitate exhaustion of settlement discussions.

1 Dated:

DLA Piper LLP (US)

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3 By:


Maria Dryden

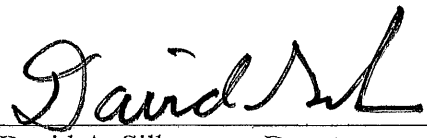
Attorney for Plaintiff

CHRISTIAN WILLIAMS

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6 Dated:

JOHN C. BEIERS, COUNTY COUNSEL

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8 By:


David A. Silberman, Deputy

Attorneys for Defendants

COUNTY OF SAN MATEO, et al.

~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, the Case Management Conference currently scheduled for October 18, 2013 is hereby continued to January 17, 2014 at 10:30 a.m., with the Joint Case Management Statement due January 10, 2014.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: FEB, 2013

Ronald M. Whyte

RONALD M. WHYTE, JUDGE
UNITED STATES DISTRICT COURT